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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA

6:25-cr- 00170-MC

v.

INDICTMENT

BERRET J. BROWN,

Defendant.

18 U.S.C. §§ 2252A(a)(2) and (b)(1)
18 U.S.C. § 2422(b)
18 U.S.C. §§ 2251(a) and (e)
18 U.S.C. § 1470

Forfeiture Allegations

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Coercion and Enticement of a Minor)
(18 U.S.C. § 2422(b))

Between on or about July 21, 2024 and continuing through on or about August 25, 2024, in the District of Oregon, defendant **BERRET J. BROWN**, did use any facility of interstate and foreign commerce, that is a computer connected to the internet, to knowingly persuade, induce, and entice an individual, Minor Victim 1, who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT 2

(Receipt of Child Pornography)
(18 U.S.C. §§ 2252A(a)(2) and (b)(1))

On or about August 16, 2024, in the District of Oregon, defendant **BERRET J. BROWN** knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8), where the producing of such visual depiction involved the use of a minor, Minor Victim 1,

Indictment

engaging in sexually explicit conduct and the visual depiction was of such conduct, using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce, by any means including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT 3
(Receipt of Child Pornography)
(18 U.S.C. §§ 2252A(a)(2) and (b)(1))

On or about August 19, 2024, in the District of Oregon, defendant **BERRET J. BROWN** knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8), where the producing of such visual depiction involved the use of a minor, Minor Victim 1, engaging in sexually explicit conduct and the visual depiction was of such conduct, using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce, by any means including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT 4
(Coercion and Enticement of a Minor)
(18 U.S.C. § 2422(b))

On or about August 23, 2024, in the District of Oregon, defendant **BERRET J. BROWN**, did use any facility of interstate and foreign commerce, that is a computer connected to the internet, to knowingly persuade, induce, and entice an individual, Minor Victim 2, who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

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COUNT 5

(Using a Minor to Produce a Visual Depiction of Sexually Explicit Conduct)
(18 U.S.C. § 2251(a) and (e))

On or about August 23, 2024, in the District of Oregon, defendant **BERRET J. BROWN**, used, employed, persuaded, and induced a minor, Minor Victim 2, to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, knowing or having reason to know the visual depiction would be transported or transmitted using any means or facility of, and in or affecting, interstate or foreign commerce; that the visual depiction was produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce; and the visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce;

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 6

(Transfer of Obscene Matter to a Minor)
(18 U.S.C. § 1470)

On or about August 23, 2024, in the District of Oregon, defendant **BERRET J. BROWN**, did, by means of interstate commerce, knowingly transfer obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

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FIRST FORFEITURE ALLEGATION

Upon conviction of any offense in Count 2, 3, or 5, defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2254, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

SECOND FORFEITURE ALLEGATION

Upon conviction of either offense in Count 1 or 4, defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2428, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

Dated: April 17, 2025

A TRUE BILL.

~~OFFICIATING FOREPERSON~~

Presented by:

WILLIAM M. NARUS, CAB #243633
Acting United States Attorney

WILLIAM M. McLAREN, OSB #143836
Assistant United States Attorney